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UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA

Transamerica Life Insurance Company,  
Interpleader Plaintiff,

v.

Tayjalaya S. Williams, Brittany A. Retzlaff,  
Collin A. Retzlaff and Denise A. Hollas,  
Interpleader Defendants.

No. 2:24-cv-00379-ROS

**PLAINTIFF'S RESPONSE TO  
DEFENDANT WILLIAMS' FILING  
AT DOCKET NO. 21**

Transamerica Life Insurance Company responds to Defendant Tayjalaya Williams' filing at ECF No. 21 (the "Filing"):

***1. Appearance By Telephone***

Transamerica does not oppose Williams' request to appear by telephone.

***2. Response To Plaintiff's Motion***

Transamerica filed a Motion for deposit-related relief at ECF No. 20. Williams's Filing addresses only a narrow facet of Transamerica's Motion for deposit-related relief: Transamerica's entitlement to attorneys' fees.

As a disputed matter arising from contract, Transamerica is entitled to fees under A.R.S. § 12-341.01. Furthermore, Transamerica is an innocent stakeholder in this matter and is entitled its reasonable attorneys' fees and costs for having to institute this action, as detailed in the Motion at pages 5 and 6. Transamerica therefore respectfully reiterates its request that the Court grants its Motion and award it its reasonable attorneys' fees and

1 costs.

2 **3. Summary Judgment**

3 Transamerica is an innocent stakeholder in this matter. Williams' request for  
4 Summary Judgment is instead better directed at and addressed by the other Defendants.  
5 Therefore, Transamerica expresses no position as to which Defendant is entitled to the  
6 Policy Benefits.

7 **4. Motion To Strike**

8 The request to strike directed at Transamerica is limited to Transamerica's  
9 statement at ¶ 15 of its Complaint that "on February 1, 2022, Transamerica spoke with the  
10 El Mirage police department, who stated that Collin Retzlaff was not cleared of  
11 involvement, and that Tayjalaya S. Williams was the prime suspect." ECF No. 1.

12 The statement at ¶ 15 is an accurate summary of a Transamerica employee's  
13 conversation with the El Mirage police department on February 1, 2022. The El Mirage  
14 police department also informed Transamerica's counsel on February 12, 2024 that the  
15 case was still under investigation. The El Mirage police department confirmed to  
16 Transamerica's counsel on April 16, 2024, that Williams remains a suspect.

17 **5. Collin Retzlaff's Summons Response**

18 Transamerica expresses no position as to any portions of the Filing directed at  
19 Collin Retzlaff.

20 DATED this 17th day of April, 2024.

21 LEWIS ROCA ROTHGERBER CHRISTIE LLP

22 By: /s/Andrew Jacobsohn

23 Stephen M. Bressler

24 Andrew Jacobsohn

25 *Attorneys for Interpleader Plaintiff Transamerica*  
26 *Life Insurance Company*

1 **Original** of the foregoing filed  
2 via CM/ECF, **copies** emailed or  
3 mailed via U.S. Mail this 17<sup>th</sup> day  
of April, 2024, to:

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